

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, et al.,

Plaintiffs,

v.

Case No. 2020-CV-01660

CITY OF WAUWATOSA, et al.,

Defendants.

DECLARATION OF KILEY B. ZELLNER

Kiley B. Zellner, being first duly sworn under oath, declares and states as follows:

1. I am an attorney licensed to practice law in the State of Wisconsin and am an attorney with Wirth + Baynard which represents the Defendants in this matter.
2. I make this Declaration on personal knowledge and my review of various documents.
3. On November 6, 2022, Attorney Sulton provided amended Requests for Admission responses but a total of 108 amended responses remained outstanding.
4. On November 15, 2022, Attorney Schwab provided additional Requests for Admission Responses. (Attached as **Exhibit A**)
5. On November 13, 2022, Plaintiffs provided my office with responses to discovery sent to Plaintiffs on October 14, 2022, and for every Interrogatory Plaintiffs responded with only: “Objection, Defendants are beyond the scope of discovery limits” and did not provide a signed response from a single Plaintiff. (Attached as **Exhibit B**)

6. On November 7, 2022, my office provided to Plaintiffs Wauwatosa Fire Department records of Aidali Rivera which indicated she was transported to Froedtert Hospital. In addition to those records, a medical authorization for Aidali Rivera's Froedtert Hospital records was provided which has not been returned to our office.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on November 23, 2022.

/s/ Kiley B. Zellner
Kiley B. Zellner